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 13

14 Attorneys for Plaintiff
 UNITED STATES OF AMERICA
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16 UNITED STATES DISTRICT COURT
 17 FOR THE CENTRAL DISTRICT OF CALIFORNIA

18 UNITED STATES OF AMERICA,) No. CV 2: 11-3582-GW-SS
19 Plaintiff,)
20 v.) Hon. George H. Wu
)
21 ONE WHITE CRYSTAL-COVERED "BAD) DECLARATION OF AMANDA GRAF IN
22 TOUR" GLOVE AND OTHER MICHAEL) SUPPORT OF UNITED STATES'
JACKSON MEMORABILIA;) OPPOSITION TO CLAIMANTS TEODORO
23 REAL PROPERTY LOCATED ON) NGUEMA OBIANG MANGUE'S AND
24 SWEETWATER MESA ROAD IN MALIBU,) SWEETWATER MALIBU, LLC'S MOTION
CALIFORNIA; ONE 2011 FERRARI 599) FOR SUMMARY JUDGMENT ON THE
25 GTO,) LIMITED ISSUE OF PROBABLE CAUSE
) OR, IN THE ALTERNATIVE, ORDER
26 Defendants.) FINDING THE GOVERNMENT LACKED
	PROBABLE CAUSE AT THE TIME IT
	INSTITUTED THE FORFEITURE IN REM

Hearing: June 20, 2013 (8:30 a.m.)

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1 I, Amanda Graf, declare and state as follows:

2 1. I am a Litigation Support Specialist with the United States Department of
3 Justice ("DOJ"), Criminal Division's Asset Forfeiture and Money Laundering Section. I
4 have been employed as a Litigation Support Specialist in the Department of Justice since
5 January 2012. Prior to that, I was a Paralegal Specialist with the United States Equal
6 Employment Opportunity Commission between September 2010 and January 2012. As
7 a Litigation Support Specialist, I assist DOJ attorneys in their litigation of this matter. I
8 received a master's degree in Criminal Justice Administration from Niagara University.

9 2. I have personal knowledge of the facts set forth in this Declaration and if
10 necessary could competently testify thereto under oath.

11 3. Attached hereto as **Exhibit 1**, is a true and correct copy of a letter sent via
12 facsimile by Janet Hudson, a former senior trial attorney at the Department of Justice's
13 Criminal Division, to Juan Morillo, Esq., dated May 2, 2011.

14 4. Attached hereto as **Exhibit 2**, is a true and correct copy of a letter sent via
15 facsimile by Janet Hudson, a former senior trial attorney at the Department of Justice's
16 Criminal Division, to Juan Morillo, Esq., dated May 25, 2011.

17 5. Attached hereto as **Exhibit 3**, is a true and correct copy of a letter sent via
18 facsimile by Janet Hudson, a former senior trial attorney at the Department of Justice's
19 Criminal Division, to Duane Lyons, Esq., dated October 5, 2011.

20 6. Attached hereto as **Exhibit 4**, is a true and correct copy of a letter sent via
21 facsimile by Janet Hudson, a former senior trial attorney at the Department of Justice's
22 Criminal Division, to Duane Lyons, Esq., dated October 27, 2011.

23 7. Attached hereto as **Exhibit 5**, is a true and correct copy of a Federal Bureau
24 of Investigation ("FBI") report of interview, relating to a December 9, 2004, interview of
25 Stephen Fuller, a former vice president at Gulfstream Aerospace Corp.
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1 8. Attached hereto as **Exhibit 6**, is a true and correct copy of an FBI report of
2 interview, relating to a December 1, 2004, interview of Raymond Banoun, managing
3 partner of Cadwalader Wickersham & Taft, LLP.

4 9. Attached hereto as **Exhibit 6A**, is a true and correct copy of a letter from
5 Stephen Fuller to Francois Meyer, dated April 20, 2004, provided by Raymond Banoun
6 to the FBI on December 6, 2004.

7 10. Attached hereto as **Exhibit 6B**, is a true and correct copy of an email from
8 Stephen Fuller to Francois Meyer, dated April 25, 2004, provided by Raymond Banoun
9 to the FBI on December 6, 2004.

10 11. Attached hereto as **Exhibit 6C**, is a true and correct copy of a photocopy of
11 a Riggs National Bank check from "Teodoro Nguema Obiang" to Gulfstream Aerospace
12 Corp. for \$500,000, dated "03/09/04," provided by Raymond Banoun to the FBI on
13 December 6, 2004.

14 12. Attached hereto as **Exhibit 7**, is a true and correct copy of an FBI report of
15 interview, relating to an October 27, 2005, interview of Simon Kareri, a former vice
16 president of Riggs National Bank.

17 13. Attached hereto as **Exhibit 8**, is a true and correct copy of an FBI report of
18 interview, relating to a July 26, 2005, interview of Ndeye Fall.

19 14. Attached hereto as **Exhibit 9**, is a true and correct copy of a report of
20 interview relating to a September 20, 2011, interview of John E. Palmer, a former United
21 States Forestry Service ranger who visited Equatorial Guinea ("EG") in 2004.

22 15. Attached hereto as **Exhibit 9A**, is a true and correct copy of "USDA-Forest
23 Service Technical Assistance Trip Equatorial Guinea," drafted by John E. Palmer.

24 16. Attached hereto as **Exhibit 10**, is a true and correct copy of a report of
25 interview relating to a July, 14, 2011, and a July 15, 2011, interview of EG CS 3, a
26 confidential informant who is a lawyer and former EG civil servant.
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1 17. Attached hereto as **Exhibit 11**, are true and correct copies of documents
2 relating to Eloba Construcccion SA provided to the United States by Deutsche Bank,
3 between April 29, 2011, and June 11, 2012.

4 18. Attached hereto as **Exhibit 12**, is a true and correct copy of a report of
5 interview relating to an August 3, 2011, interview of John Stewart, a former contractor
6 for the United States Agency for International Development.

7 19. Attached hereto as **Exhibit 13**, is a true and correct copy "Teodorin's
8 World," published by Foreign Policy in March 2011, and reviewed by the Government
9 prior to April 26, 2011.

10 20. Attached hereto as **Exhibit 14**, is a true and correct copy of a U.S.
11 Department of State cable, dated March 21, 2011.

12 21. Attached hereto as **Exhibit 15**, is a true and correct copy of a U.S.
13 Department of State cable, dated March 12, 2009.

14 22. Attached hereto as **Exhibit 16**, is a true and correct copy of "The Secret
15 Life of a Shopaholic," a report published by Global Witness in November 2009, and
16 reviewed by the Government prior to April 26, 2011.

17 23. Attached hereto as **Exhibit 17**, is a true and correct copy of interview notes
18 drafted by Edward Bishop, a DOJ contract investigator, relating to an August 2011
19 interview of IMF Economist B, a confidential informant who serves as an International
20 Monetary Fund economist and visited EG in 2010.

21 24. Attached hereto as **Exhibit 18**, is a true and correct copy of a report of
22 interview, relating to an August 18, 2011, interview of a confidential informant who
23 serves as an International Monetary Fund economist and visited EG in 2007.

24 25. Attached hereto as **Exhibit 19**, is a true and correct copy of a report of
25 interview, relating to an August 24, 2011, interview of Ian Cooling, a former employee
26 of Ocean Energy.
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1 26. Attached hereto as **Exhibit 20**, is a true and correct copy of a Power Point
2 Presentation, provided to the Department of Justice by Cleary Gottlieb Steen &
3 Hamilton, LLP, in or around June 3, 2011.

4 27. Attached hereto as **Exhibit 21**, is a true and correct copy of a report of
5 interview, relating to an October 24, 2011, interview of a GSF Executive, a confidential
6 informant who formerly worked for Global Santa Fe in EG.

7 28. Attached hereto as **Exhibit 22**, is a true and correct copy of Grupo Sofona's
8 1999 financial statements, produced to the United States Senate's Permanent
9 Subcommittee on Investigations ("PSI") by Riggs National Bank. These documents
10 were obtained from the PSI, and reviewed by the Government between April 29, 2011,
11 and June 11, 2012.

12 29. Attached hereto as **Exhibit 23**, is a true and correct copy of Grupo Sofona's
13 2000 financial statements, produced to the PSI by Riggs National Bank. These
14 documents were obtained from the PSI, and reviewed by the Government between April
15 29, 2011, and June 11, 2012.

16 30. Attached hereto as **Exhibit 24**, is a true and correct copy of Grupo Sofona's
17 2001 financial statements, produced to the PSI by Riggs National Bank. These
18 documents were obtained from the PSI, and reviewed by the Government between April
19 29, 2011, and June 11, 2012.

20 31. Attached hereto as **Exhibit 24A**, is a true and correct copy of an English
21 translation of Grupo Sofona's 2001 financial statements.

22 32. Attached hereto as **Exhibit 25**, is a true and correct copy of a Company
23 Report on Somagui, produced to the PSI by J.P. Morgan Chase Bank. These documents
24 were obtained from the PSI, and reviewed by the Government between April 29, 2011,
25 and June 11, 2012.
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1 33. Attached hereto as **Exhibit 26**, is a true and correct copy of an email from
2 Sara Cabrera, a member of Riggs National Bank's Investigation Group, to Bryant
3 Moravek, a Riggs National Bank officer, dated January 5, 2004. This email was
4 produced to the PSI by the Office of the Comptroller of the Currency. These documents
5 were obtained from the PSI, and reviewed by the Government between April 29, 2011,
6 and June 11, 2012.

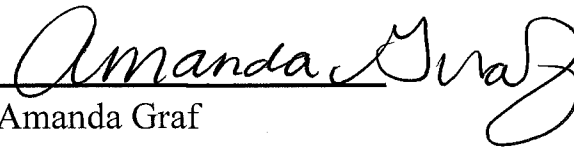
7 34. Attached hereto as **Exhibit 27**, is a true and correct copy of "How Many
8 Investigators Does It Take to Catch a Kleptocrat," published by Foreign Policy on April
9 7, 2011, and reviewed by the Government prior to April 26, 2011.

10 35. Attached hereto as **Exhibit 28**, is a true and correct copy of an excerpt of
11 "Equatorial Guinea: Selected Issues and Statistical Index," published by the
12 International Monetary Fund in or around December 2003, and reviewed by the
13 Government prior to April 26, 2011.

14 36. Attached hereto as **Exhibit 29**, is a true and correct copy of an excerpt of
15 "Report of Equatorial Guinea: Statistical Appendix," published by the International
16 Monetary Fund in or around April 2010, and reviewed by the Government prior to April
17 26, 2011.

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20 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of
21 the United States that the foregoing is true and correct to the best of my knowledge.
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Executed on May 2, 2013 in Washington, D.C.

A handwritten signature in cursive script, reading "Amanda Graf". The signature is written in black ink and is positioned above the printed name.

Amanda Graf

Litigation Support Specialist

Criminal Division

United States Department of Justice